

EI-18555

Dear Dave,

My name is Robert Shumaker. I am the current president of the Alaska Farmers Union. I have been involved with agriculture in Alaska for better than 20 years and the one big issue that we face in Alaska is that our agriculture land base is very limited. Point MacKenzie agriculture land is show case land. Giving up agricultural land is not in Alaska's best interests. The proposed rail extension will have a large effect upon the Point MacKenzie Agricultural Project Area (PMAA). Food Security is a large issue in Alaska. Before I broach that avenue I would like to share some concerns.

I have grave concern in seeing the East Mac Variant route being picked in the Final EIS. I was displeased because this route was not presented by the STB or ARRC in any public comment forums. I question the reasons it was not included because it was the only potential route that had a pre-existing easement application. I believe it was not listed in the Draft EIS because it would have generated negative comments from the public. The "variant" was a significant change and should have been studied and included in a supplement prior to the release of the Final EIS.

I was also displeased to learn that the ARRC has applied for a new location of the terminal reserve. Was this also a late change to avoid negative public comments in the EIS process? The new location is in the middle of the PMAA. This is a horrible location for a train yard and storage facility! I would hope you agree, but you have not studied this location, so any response could not be supported (except by common sense). I believe the appropriate sections regarding this are:

2.4.11.3 Visual Resources – The visual impacts of locating the terminal reserve within the PMAA was not studied in the Final EIS. If the Terminal Reserve location is moved within the PMAA it would be a significant change and a supplemental report MUST be required.

8.5.1.1 Common Impacts – Operation Impacts - The proposed rail line extension would include a terminal reserve (rail yard) at the end of the line in the Port MacKenzie District. The rail yard would provide for receiving, sorting, temporary storage, and distribution of commodities shipped on the rail line. Possible activities at the facility would include receiving inbound trains, switching rail cars, loading and unloading cars, storing commodities, and building and departing outbound trains. Other activities could include arriving/departing track maintenance equipment and operation of a switch locomotive and cargo handling equipment. I believe the possible activities are appropriate for a terminal reserve at the stated location south of the PMAA. Estimated Particulate Matter emissions from the terminal reserve would total ½ a metric ton per year. What effects will that have on the adjacent (on all sides!) farmland? It would be inappropriate to locate this pollution source within the PMAA and a supplemental analysis of Particulate Matter pollution MUST be required if the location were moved to within the PMAA.

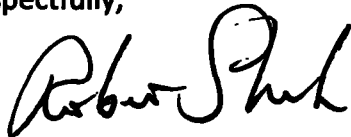


9.5.1.2 Noise from Operation – Terminal Reserve – No noise impacts would be anticipated at southern terminus. No noise contours were included in the Final EIS for a terminal reserve location within the PMAPA. What hours would loading and unloading occur? How much noise does fixing a train make? How loud is an idling train? If the Terminal Reserve location is moved within the PMAA it would be a significant change and a supplemental report MUST be required.

13.1.5.1 Proposed Action - Operation Impacts to Land Use - Existing land ownership and use of the terminal reserve area, communications tower, and track siding locations would be permanently changed to allow for these facilities associated with rail line operation and maintenance. I am opposed to a terminal reserve location that would convert land with specific covenants issued by the State of Alaska to protect the lands agricultural value in perpetuity, to one that would be permanently changed to allow for facilities associated with rail line operation and maintenance. The impacts to the PMAPA by locating a terminal reserve within the PMAPA boundaries have not been studied and would represent a significant change. Impacts to the PMAPA by a 200 foot railroad footprint are significant, the impacts of a 1000 foot wide 2 mile long terminal reserve will be VERY SIGNIFICANT!

I would like to conclude by asking why Alaskan farmland? It appeared to be spared from most railroad development until public comment was over. Now that the publics' opportunity to be involved is gone, many new and significant changes have been made that will negatively impact agriculture and Alaska's food security. Please do not release a Final Decision before fully studying the new & significant impacts the ARRC is proposing. We have far more wetlands ready and open for development. Please stay away from our agriculture lands. Thank you for your consideration,

Respectfully;

A handwritten signature in black ink, appearing to read "Robert Shumaker". The signature is fluid and cursive, with the first name "Robert" and last name "Shumaker" clearly distinguishable.

Robert Shumaker